# Exhibit C

		Page 1
1	IN THE UNITED STATES DISTRICT COURT	
2	FOR THE DISTRICT OF NEW JERSEY	
3		
4 5	IN RE: SCHERING-PLOUGH : CORPORATION/ENHANCE :CIVIL ACTION NO. SECURITIES LITIGATION :08-397(DMC)(JAD)	
6 7 8	IN RE: MERCK & CO., INC.:  VYTORIN/ZETIA SECURITIES :CIVIL ACTION NO.  LITIGATION :08-2177(DMC)(JAD)	
9	IN RE: SCHERING-PLOUGH : CORPORATION ENHANCE :CIVIL ACTION NO. ERISA LITIGATION :08-1432(DMC)(JAD)	
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}	JUNE 20, 2011	
	Videotape deposition of RAYMOND J. SKELLY, taken pursuant to notice,	
	was held at the law offices of Morgan, Lewis & Bockius LLP, 1701 Market Street, 18th Floor, Philadelphia, Pennsylvania 19103, beginning	
ı	at 10:00 a.m., on the above date, before Amanda Dee Maslynsky-Miller, a Certified Realtime Reporter and Notary Public in and	
<b>,</b>	for the State of Pennsylvania.	
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2	w w	
3	GOLKOW TECHNOLOGIES, INC. 877.370.3377 ph   917.591.5672 fax	
1	deps@golkow.com	

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1	APPEARANCES:	1		
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3	JEFF A. ALMEIDA, ESQUIRE	4	Testimony of: RAYMOND J. SKELLY	2
4	GRANT & EISENHOFER, P.A.	5	·	
5	1201 North Market Street Wilmington, Delaware 19801	6	By Mr. Juceam 8, 96 By Mr. Almeida 83	
	(302) 622-7000	7	by Par. All Neida 05	
6 7	Jalmeida@gelaw.com	8		
8 9	FOR THE DEFENDANT MERCK/SCHERING-PLOUGH:	9		
10		10	EXHIBITS	
11	DANIEL J. JUCEAM, ESQUIRE PAUL, WEISS, RIFKIND, WHARTON			
	& GARRISON, LLP	11 12	NO. DESCRIPTION PAGE	
12	1285 Avenue of the Americas New York, New York 10019	13	Exhibit-270 Ray Skelly LinkedIn	
13	(212) 373-3697 djuceam@paulweiss.com	14	Profile 24	
14	•	15	Exhibit-271 Notice of Deposition of Ray Skelly 48	
15	- and -	16	Exhibit-272 5/23/11 Letter from	
16	VIA TELEPHONE: SUZANNE K. SKINNER, ESQUIRE	17	R. Skelly to J. Sonenfeld 50	
17	PAUL, WEISS, RIFKIND, WHARTON	l	Exhibit-273 8/10/11 Letter from	
18	& GARRISON, LLP 1285 Avenue of the Americas	18 19	K. McGee to R. Skelly 53 Exhibit-274 Draft Unsigned Declaration	
	New York, New York 10019		of Ray Skelly 70	
19	(212) 373-3697 sskinner@paulweiss.com	20	Exhibit-275 Proposed Amended	
20 21		21	Complaint 80	
22		22 23		
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Page 28 Page 26 the case really stands on. this litigation? 1 1 2 A. I'm not sure of the 2 Q. Okay. Did you have any conversations with the plaintiffs' side 3 3 terminology. As a witness, yeah, okay. of the case about the allegations that I don't fully understand the term 4 4 5 confidential witness. But, yeah, I are made? 5 understand I've been identified as a 6 A. I had a telephone 6 7 conversation with someone who told me 7 witness, that's why I'm here. that they were doing an -- an Do you understand you've 8 8 investigation, a long time ago. I mean, 9 been identified as a witness by the 9 I can't even remember how long ago it 10 plaintiffs in the case? 10 was. And, you know, I guess I wasn't Yes. Yes. 11 Α. 11 really, you know, aware of what their --12 Q. And do you know why the 12 plaintiffs have identified you as a 13 their aim was. I kind of viewed them as, 13 you know, an information gathering, 14 14 witness? perhaps a marketer, perhaps someone who 15 A. I'm not entirely certain. 15 could, you know, be -- you know, part of Do you have any clue? 16 16 Q. my network of contacts. I believe at the They probably want me to 17 17 Α. support their -- their case. time I was -- I was looking for 18 18 Q. And do you know -- have any 19 employment. I don't know if I was still 19 reason to know why they would want you to with Camstar or not. 20 20 But, yeah, I remember a support their case? 21 21 conversation with someone, probably 22 A. Perhaps to -- to make some 22 from -- from the plaintiffs' law firm, 23 statements indicting the corporation I 23 the law firm representing the plaintiffs. 24 work for in some way. 24 Page 29 Page 27 1 Q. How many conversations with 1 Q. Do you understand who the plaintiffs are in the litigation? 2 the plaintiffs' firm did you have? 2 A. Well, I remember that 3 A. Generally. You know, I 3 initial conversation. And then a year mean, you know, I'm not really familiar 4 4 later, or a long time later, I remember with the law firm or, you know -- but I 5 5 getting a call from the law firm, it may understand it's a class action suit and 6 6 7 even be the individual sitting here at this law firm is acting on behalf of the 7 the table, Jeff, after I had received the 8 8 class and -- and suing Merck. You know, 9 letter from the law firm -- okay, no, I 9 that's my understanding of it. had to get another call. 10 10 Okay. Q. So I got another -- hang on. 11 A. About what, I'm not so sure, 11 So there's an initial call from the 12 but, you know --12 investigator. Then there was another That was going to be my next 13 13 Q. contact from the investigator, as I 14 14 question. 15 received a letter that that person asked Do you know anything about 15 me to sign, okay. I looked at the the content of the litigation? 16 16 information in the letter and I did not A. I mean, I did, you know, do 17 17 consider that information to be factual, some searching and read a little bit 18 18 and I indicated I would not sign it. about the ENHANCE study, you know, to 19 19 I got another call from a 20 kind of try to figure out what's going 20 on. You know, I have my -- you know, I representative of a law firm, that --21 21 which may be this person Jeff here today, 22 have, like, some inkling as to what's 22 and that person suggested that if I 23 going on but I'm not -- it's nothing 23 didn't sign it, I would be subpoenaed and definitive. You know, I don't know what 24 24

		- ^^			B 33
1	I said so be it. I'm not going to sign	Page 30	1	year that was?	Page 32
1	I said, so be it. I'm not going to sign		2	A. I would think 2008. I would	
2 3	false information, you know. And here I am today.		3	quess 2008.	
i			4	Q. And did you ever get the	
4	Q. Okay. So we've talked about			name of the lawyer investigator or	
5	three phone calls, correct?		5		
6	MR. ALMEIDA: Objection.		6	investigator who called you?	
7	THE WITNESS: So far as I		7	A. Yeah, I think it's in the	
8	can recall, yes.		8	documents, you know, that I have. But	ľ
9	BY MR. JUCEAM:		9	I'd have to look it up in the documents.	
10	Q. There was the initial call		10	Q. We'll we'll look at all	
11	with the investigator, right?		11	the documents.	
12	A. Right.		12	At this point I just want to	
13	Q. There was a call one year		13	see if I can see what you remember	
14	later from a law firm in connection with		14	A. Right.	
15	a letter that you received?		15	Q independently.	
16	A. Yes.		16	The person that called you,	
17	Q. And then there was a third		17	was it a man or a woman?	
18	call in which you were told that if you		18	A. It was a man.	
19	didn't sign you would be subpoenaed?		19	Q. And how long was the first	
20	MR. ALMEIDA: Objection.		20	phone call? I assume was it on the	
21	THE WITNESS: Okay.		21	phone?	
22	BY MR. JUCEAM:		22	A. Yeah. Yeah.	
23	Q. Is that correct or not?		23	Q. Okay.	
24	A. You know, that's what I		24	A. The first phone call was, I	
- '	71 Tourittory diaes what I		= '	,,, ,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	
		Page 31			Page 33
1	that's my understanding of it. I mean, I	Page 31	1	don't know, it was it was a while, I	Page 33
1 2	that's my understanding of it. I mean, I looked at the letter that I received, I	Page 31	1 2	. 11 1 0 4 0 4 1 3 1 3 2	Page 33
2	looked at the letter that I received, I	Page 31	1	guess we talked for 10, 15 minutes. You	Page 33
2 3	looked at the letter that I received, I submitted the letter	Page 31	2 · 3	guess we talked for 10, 15 minutes. You know, I didn't understand, you know, who	Page 33
2 3 4	looked at the letter that I received, I submitted the letter Q. Right.	Page 31	2 · 3 4	guess we talked for 10, 15 minutes. You know, I didn't understand, you know, who I was talking to, perhaps, very well.	Page 33
2 3 4 5	looked at the letter that I received, I submitted the letter Q. Right. A as, you know, as a	Page 31	2 3 4 5	guess we talked for 10, 15 minutes. You know, I didn't understand, you know, who I was talking to, perhaps, very well. But I was just, you know, trying to be	Page 33
2 3 4 5 6	looked at the letter that I received, I submitted the letter Q. Right. A as, you know, as a document to you folks.	Page 31	2 3 4 5 6	guess we talked for 10, 15 minutes. You know, I didn't understand, you know, who I was talking to, perhaps, very well. But I was just, you know, trying to be social.	Page 33
2 3 4 5 6 7	looked at the letter that I received, I submitted the letter Q. Right. A as, you know, as a document to you folks. And, you know, I just looked	Page 31	2 3 4 5 6 7	guess we talked for 10, 15 minutes. You know, I didn't understand, you know, who I was talking to, perhaps, very well. But I was just, you know, trying to be social.  Q. How did this individual	Page 33
2 3 4 5 6 7 8	looked at the letter that I received, I submitted the letter Q. Right. A as, you know, as a document to you folks. And, you know, I just looked at the information in that letter and I	Page 31	2 3 4 5 6 7 8	guess we talked for 10, 15 minutes. You know, I didn't understand, you know, who I was talking to, perhaps, very well. But I was just, you know, trying to be social.  Q. How did this individual identify himself to you?	Page 33
2 3 4 5 6 7 8 9	looked at the letter that I received, I submitted the letter Q. Right. A as, you know, as a document to you folks. And, you know, I just looked at the information in that letter and I just I'm sorry, I couldn't agree with	Page 31	2 3 4 5 6 7 8	guess we talked for 10, 15 minutes. You know, I didn't understand, you know, who I was talking to, perhaps, very well. But I was just, you know, trying to be social.  Q. How did this individual identify himself to you?  A. As an investigator.	Page 33
2 3 4 5 6 7 8 9	looked at the letter that I received, I submitted the letter Q. Right. A as, you know, as a document to you folks. And, you know, I just looked at the information in that letter and I just I'm sorry, I couldn't agree with it. I couldn't sign I couldn't sign	Page 31	2 3 4 5 6 7 8 9	guess we talked for 10, 15 minutes. You know, I didn't understand, you know, who I was talking to, perhaps, very well. But I was just, you know, trying to be social.  Q. How did this individual identify himself to you?  A. As an investigator. Q. And what did he say he was	Page 33
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2 3 4 5 6 7 8 9 10 11 12 13	looked at the letter that I received, I submitted the letter Q. Right. A as, you know, as a document to you folks. And, you know, I just looked at the information in that letter and I just I'm sorry, I couldn't agree with it. I couldn't sign I couldn't sign it. And that's what I told whomever, and then they indicated that I	Page 31	2 3 4 5 6 7 8 9 10 11 12 13	guess we talked for 10, 15 minutes. You know, I didn't understand, you know, who I was talking to, perhaps, very well. But I was just, you know, trying to be social.  Q. How did this individual identify himself to you?  A. As an investigator. Q. And what did he say he was investigating?  A. You know, he may have been very accurate in indicating that he was	Page 33
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through telephone conversations.  Q. Did they say anything to the seffect that they were conducting a market survey?  A. No.  MR. ALMEIDA: Objection.  MR. ALMEIDA: Objecting,  MR. JUCEAM: He's objecting,  MR. ALMEIDA: You can answer the question.  MR. JUCEAM: You can answer the que			_			
2 Q. Did they say anything to the survey? 3 A. No. 4 Survey? 5 A. No. 5 It's for 6 MR. ALMEIDA: Objection. 7 THE WITNESS: I don't 8 remember. Sorry. 9 BY MR. JUCEAM: 10 Q. Did they tell you how they 11 got your name? 12 MR. ALMEIDA: Objection. 13 THE WITNESS: I I don't 14 know. 15 BY MR. JUCEAM: 16 Q. Did they tell you that they 17 might use the statements you were making 18 in a public court filing? 19 A. At at some point, you 10 know, I think it got down to that. And I 21 said, no, I don't give permission for 22 that, you know. So it's, like, you know, 24 were talking about to, you know, to  Page 35  1 appear in any, you know, formal 2 statements of any sort. 3 You know, we were just I 4 was trying to be social and just make 4 conversation with the person. 6 Q. So you told the investigator 6 that you did not want your statements to appear in a public court filing? 9 A. Correct. 10 Q. What did what else can 11 trecall exactly, 12 Q. If they had told you from 13 to you know, row so in a public court filing, 14 would you have spoken to the person at all all? 15 expression of the course in a public court filing, 16 Q. What did what else can 17 You know, to so in the person at all all? 18 would you have spoken to the person at all all? 20 A. Probably not. 21 Q. What did what else can 22 you recall about what was said to you in	,	·	Page 34	4	MD ALMETDA. Objection	Page 36
3 effect that they were conducting a market survey?						
4 MR. JUCEAM: He's objecting, it's for THE WITNESS: I don't Remember. Sorry. 9 BY MR. JUCEAM: 10 Q. Did they tell you how they 11 got your name? 12 MR. ALMEIDA: Objection. 13 THE WITNESS: I I don't 14 know. 15 BY MR. JUCEAM: 16 Q. Did they tell you that they 17 might use the statements you were making 18 in a public court filing? 19 A. At at some point, you 10 know, I think it got down to that. And I said, no, I don't give permission for 12 that, you know. So it's, like, you know, to 16 Q. Did they emmission for 17 they might use the statements you were making in a public court filing? 18 in a public court filing? 19 A. At at some point, you were made, you know, I may have. But if I didn't want I didn't want what we were talking about to, you know, to 17 that you did not want your statements to a appear in any, you know, we were just I was trying to be social and just make conversation with the person. 10 Q. What did they say in response to that? 11 response to that? 12 A. I don't recall exactly, but it sounded like, you know, I don't recall exactly. 13 to you recall about what was said to you in 14 A. Probably not. 15 BY MR. JUCEAM: 16 MR. ALMEIDA: You can answer the question. 17 HE WITNESS: So what did we talk about? 18 MR. JUCEAM: 19 WR. JUCEAM: 19 You know, he started, like, asking me talk wout? 19 You know, he started, like, asking me talk wout the ENHANCE study. You know, did you know, I may have. But if I wasn't sure. I mean, it was a catchy. You wasn't sure. I mean, it was a catchy. I wasn't sure. I mean, it was a catchy. I wasn't sure. I mean, it was a catchy. I wasn't sure. I mean, it was a catchy. You flow, wind have a sure in a public court filing? 19 A. Correct. 10 Q. What did they say in response to that? 11 to learn there was no review board or something, how do you feel about that, the outset that they were going to use your words in a public court filing. 19 A. That I recall, yes. 20 Q. Whatever you knew about 21 You recall about what was said to you in						
5 Å. No. 6 MR. ALMEIDA: Objection. 7 THE WITNESS: I don't 8 remember. Sorry. 9 BY MR. JUCEAM: 10 Q. Did they tell you how they 11 got your name? 12 MR. ALMEIDA: Objection. 13 THE WITNESS: I I don't 14 know. 15 BY MR. JUCEAM: 16 Q. Did they tell you that they 17 might use the statements you were making 18 in a public court filing? 19 A. At at some point, you 20 know, I think it got down to that. And I 21 said, no, I don't give permission for 22 that, you know. So it's, like, you know, 23 I didn't want I didn't want what we 24 were talking about to, you know, to 25 appear in any, you know, to 26 Q. So you told the investigator 27 that you did not want your statements to 28 appear in a public court filing? 29 A. Correct. 20 Q. What did they say in 21 response to that? 20 Q. What did they say in 21 response to that? 22 A. I don't recall exactly, but 23 I town of the investigator 24 they ould not want your statements to 25 appear in a public court filing? 26 A. Correct. 27 A. I don't recall exactly, but 28 treatments of any sort. 29 Q. What did they say in 20 Q. What did they say in 20 Q. What did they say in 21 response to that? 20 Q. What did they say in 21 response to that? 22 A. I don't recall exactly, but 23 I derive word on yound whey 24 would you have spoken to the person at 25 all? 26 Q. What did what else can 27 you recall about what was said to you in	i	,				
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